

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

ALLIANCE FOR HIPPOCRATIC MEDICINE,)
on behalf of itself, its member organizations, their)
members, and these members' patients;)
AMERICAN ASSOCIATION OF PRO-LIFE)
OBSTETRICIANS AND GYNECOLOGISTS,)
on behalf of itself, its members, and their patients;)
AMERICAN COLLEGE OF PEDIATRICIANS,)
on behalf of itself, its members, and their patients;)
CHRISTIAN MEDICAL & DENTAL)
ASSOCIATIONS, on behalf of itself, its members)
and their patients; **SHAUN JESTER, D.O.,** on)
behalf of himself and his patients; **REGINA**)
FROST-CLARK, M.D., on behalf of herself and)
her patients; **TYLER JOHNSON, D.O.,** on)
behalf of himself and his patients; and **GEORGE**)
DELGADO, M.D., on behalf of himself and his)
Patients,

Case No. 2:22-cv-00223-z

Plaintiffs,

v.

U.S. FOOD AND DRUG ADMINISTRATION;)
ROBERT M. CALIFF, M.D., in his official)
capacity as Commissioner of Food and Drugs, U.S.)
Food and Drug Administration; **JANET**)
WOODCOCK, M.D., in her official capacity as)
Principal Deputy Commissioner, U.S. Food and)
Drug Administration; **PATRIZIA CAVAZZONI,**)
M.D., in her official capacity as Director, Center for)
Drug Evaluation and Research, U.S. Food and Drug)
Administration; **U.S. DEPARTMENT OF**)
HEALTH AND HUMAN SERVICES; and)
XAVIER BECERRA, in his official capacity as)
Secretary, U.S. Department of Health and Human)
Services,)

Defendants.

APPLICATION FOR ADMISSION *PRO HAC VICE*

I. Applicants are attorneys and members of the law firm of Samples, Jennings, Clem & Fields, PLLC, with offices at 130 Jordan Drive, Chattanooga, Tennessee 37421, a phone number of (423) 892-2006, and a fax number of (423) 892-1919.

II. Applicants will sign all filings with the following names: Michael S. Jennings; Darald J. Schaffer.

III. Applicants seek pro hac vice admission for purposes of filing an Amicus Brief in the above-styled case on behalf of the Chattanooga National Memorial for the Unborn.

IV. Applicants are members in good standing of the bar of the highest court of the State of Tennessee, where Applicants regularly practice law.

1. Michael S. Jennings, Bar License Number 11010. Admission Date October 6, 1984.

2. Darald J. Schaffer, Bar License Number 029375. Admission Date November 1, 2020.

V. Applicants have also been admitted to practice before the following courts.

1. Michael S. Jennings:

i) Admitted in the State of Georgia in June of 1984.

2. Darald J. Schaffer:

i) Admitted in the United States District Court for the Eastern District of Tennessee on December 16, 2020;

ii) Admitted in the United States District Court for the Western District of Tennessee on June 3, 2022.

VI. Neither Applicant has ever involuntarily lost, temporarily or permanently, the right to practice before any court or tribunal, or resigned in lieu of discipline.

- VII. Neither Applicant has ever been subject to grievance proceedings or involuntary removal proceedings – regardless of outcome – while a member of the bar of any state or federal court or tribunal that requires admission to practice.
- VIII. Neither Applicant has been charged, arrested, or convicted of a criminal offense or offenses.
- IX. Neither Applicant has filed for *pro hac vice* admission in the United States District Court for the Northern District of Texas during the past three (3) years.
- X. Local counsel of record associated with Applicant in this matter is H. Dusty Fillmore III of The Fillmore Law Firm, L.L.P. whose office address is 201 Main Street, Suite 700, Fort Worth, Texas 76102. Mr. Fillmore’s phone number is (817) 332-2351 and his fax number is (817) 870-1859.
- XI. Applicants have read *Dondi Properties Corp. v. Commerce Savs. & Loan Ass’n*, 121 F.R.D.284 (N.D. Tex 1988) (en banc), and the local civil rules of this court and will comply with the standards of practice adopted in *Dondi* and with the local civil rules.
- XII. Applicants respectfully request to be admitted to practice in the United States District Court for the Northern District of Texas for purposes of filing an Amicus Brief in this cause only. Applicant certifies that a true and correct copy of this document has been filed in the court’s ECF filing system and served upon each attorney of record through ECF. The filing fee of \$200 (\$100 for Mr. Schaffer, and \$100 for Mr. Jennings) has or will be promptly submitted through PACER.

SAMPLES, JENNINGS, CLEM & FIELDS, PLLC

By: /s/ Michael S. Jennings
Michael S. Jennings, TN BPR 11010

By: /s/ Darald J. Schaffer
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CERTIFICATE OF SERVICE

I certify that this document will be served on all defendants via ECF and via first class

United States mail and email to:

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This 9th day of January, 2023.

SAMPLES, JENNINGS, CLEM & FIELDS, PLLC

By: /s/Darald J. Schaffer
Darald J. Schaffer